

April 27, 2023

VIA ECF

The Honorable Sarah J. Netburn
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, New York 10007

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In re Terrorist Attacks on September 11, 2001, Case No. 1:03-md-1570-GBD-SN (S.D.N.Y.)

Dear Judge Netburn:

Al Rajhi Bank respectfully submits this letter regarding Plaintiffs' opposition (ECF No. 9051) to the Bank's motion for a protective order to strike certain subject areas in Plaintiffs' Revised Notice of Oral Deposition of Defendant Al Rajhi Bank Pursuant to Rule 30(b)(6) (ECF No. 9038). This noticed Rule 30(b)(6) deposition is scheduled to take place on Thursday, May 11, 2023, two weeks from today. After the Bank filed its motion, but before Plaintiffs filed their opposition, Plaintiffs served the Bank with a Second Revised Notice, which Plaintiffs then attached to their opposition. The late-breaking revisions do not meaningfully address the Bank's objections as laid out in the Bank's motion, so the Bank stands on the arguments in its motion and will not burden the Court with any proposed reply.

Respectfully submitted,

/s/ Nicole Erb

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